



Amphenol Corporation

World Headquarters

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September 7, 1994



Mr. Kevin Pierard, Chief
Technical Enforcement Section #1
USEPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

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RE: Administrative Order on Consent (AOC)
Franklin Power Products/Amphenol Corporation
IND 044 587 848

Dear Mr. Pierard:

Your letter of August 30, 1994 was received by the Respondents on September 6, 1994. As you may have already noted, the Corrective Measures Study (CMS) Work Plan was delivered to your offices on September 6, 1994 pursuant to the AOC and your letter of July 22, 1994.

After reading your latest correspondence, it would appear that there may be some misunderstanding regarding the Respondents' intentions with respect to the Interim Corrective Measures (ICM) planned and the CMS. We fully understand that the CMS must evaluate all applicable and appropriate remedies for the Site. It has never been our intent to suggest that CMS would evaluate only one remedial alternative for groundwater or that the CMS would be limited in its evaluation of all the remedial needs at the facility. The Work Plan submitted should be clear on that count.

Nonetheless, we believe it would be imprudent to neglect the opportunity afforded to both the Respondents and the USEPA through the early implementation of a probable portion of the final remedy. At the same time the area of greatest contamination is being treated, the data gathered will provide invaluable insight into the capture zone of onsite recovery wells, the potential for flow reversal and subsequent capture of portions of the offsite plume and the effectiveness of our efforts to prevent interception of groundwater by the storm sewer. In addition, should additional soil treatment be indicated by the CMS, the data from the ICM can be also used to evaluate the feasibility of dewatering Unit B. In contrast to the data generated during the RFI which identified the nature and extent of site-related constituents, this information addresses the efficacy of potential remedial measures; furthermore, we believe these data would have to be collected and evaluated before any remedial measures could be finalized.

On a related matter, the Respondents recognize that the AOC currently requires that a draft CMS report is due within 90 days of the USEPA's approval of the Work Plan. We believe, however, that the AOC is a dynamic document, able to accommodate changes in a project's scope over its life. Section XXIV (Subsequent Modification) was clearly included for just that purpose. We need look no further than the time necessary to complete the RFI activities for this project to see that the AOC can be easily modified when Site-specific conditions warrant. We are, therefore, reiterating our request for an amendment by mutual agreement pursuant to Section XXIV.1 to include the schedule included in our CMS Work Plan as part of the AOC. Such an amendment is consistent with the USEPA's goal of ensuring that the Corrective Measure(s) most fully meet technical, human health and environmental criteria.

The Respondents remain available to discuss this matter with you should you desire it. If you require some additional information or if you have any questions, please contact me at (203) 265-8760.

Sincerely,



Samuel S. Waldo
Director Environmental Affairs

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c: S. Gard
P. Perez